

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE**

PENNY NINIVAGGI et al., individually and  
on behalf of all others similarly situated,

*Plaintiffs,*

v.

UNIVERSITY OF DELAWARE,

*Defendant.*

Civil Action No. 20-cv-1478-SB

HANNAH RUSSO, individually and on be-  
half of all others similarly situated,

*Plaintiff,*

v.

UNIVERSITY OF DELAWARE,

*Defendant.*

Civil Action No. 20-cv-1693-SB

**JOINT STIPULATION OF VOLUNTARY  
DISMISSAL PURSUANT TO RULE 41(a)(1)(A)(ii)**

Plaintiffs Penny Ninivaggi, Todd Mickey and James Nigrelli (the “Parent Plaintiffs”), Plaintiffs Michael Ninivaggi, Jake Mickey and Cailin Nigrelli (the “Student Plaintiffs”) and Defendant University of Delaware hereby stipulate and agree that, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parent Plaintiffs hereby dismiss all claims in this action against Defendant with prejudice, with all sides to bear their own costs and fees. The parties agree that when the Student Plaintiffs move to certify a class in this matter, the class will include students only and not parents. Otherwise, this dismissal does not impact the ongoing claims of the Student Plaintiffs.

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